

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|---------------------------------|---|----------------|
| CROSS COUNTRY MOTOR CLUB, INC., |) | |
| Plaintiff, |) | |
| v. |) | CIVIL ACTION |
| |) | NO.04-11992-NG |
| AUTO SERVICES COMPANY, INC, |) | |
| Defendant. |) | |
| _____ |) | |

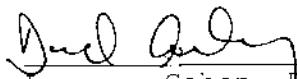
**PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT
AGAINST DEFENDANT AUTO SERVICES COMPANY, INC.**

Pursuant to Fed. R. Civ. P. 55(a), the plaintiff Cross Country Motor Club, Inc. hereby requests that default enter against the defendant Auto Services Company, Inc. as a result of its failure to plead or otherwise defend in this matter, over ten days having long passed since the motion to amend the complaint was allowed on May 12, 2005 (the amended complaint was filed with the motion on April 21, 2005). By letter dated April 21, 2005, a letter was sent to out-of state counsel for the defendant advising it that the original amended complaint was being filed "in the event that the motion is allowed." In addition, notice of the Amended Complaint's filing was electronically sent to local counsel for the defendant. Rule 15 requires that all responses to an amended pleading be served within ten days.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY.

CROSS COUNTRY MOTOR CLUB, INC.,

By its Attorneys,



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